

JERROLD OPPENHEIM  
57 MIDDLE STREET  
GLOUCESTER, MASSACHUSETTS 01930-5736 USA  
+1 (978) 283-0897  
Fax +1 (978) 283-0957  
[JerroldOpp@DemocracyAndRegulation.com](mailto:JerroldOpp@DemocracyAndRegulation.com)  
[www.DemocracyAndRegulation.com](http://www.DemocracyAndRegulation.com)

June 9, 2005

Mary Cottrell  
Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Mass. 02110

RE: Bay State Gas, DTE 05-27 – notice of intent to sponsor witnesses

Dear Secretary Cottrell:

This notice of intent to sponsor witnesses is filed pursuant to the direction and leave of the Hearing Officer in the above-captioned proceeding. MASSCAP et al. sets forth below the up to 15 witnesses it intends to sponsor in this proceeding. This notice is on the understanding that it represents current intent and that intent may change; MASSCAP may sponsor fewer, or more, witnesses than set forth in this notice. It is also possible that current negotiations will resolve MASSCAP's issues and that MASSCAP will sponsor no witnesses. MASSCAP will update this notice as and if its intent changes.

1-4. Agency energy and fuel assistance directors (e.g., AL Mickie, Greater Lawrence Community Action Council; Carol Cushing, Self Help Inc.) will testify about the operations of the Bay State Gas low-income energy efficiency programs in their areas, as well as the impact of gas rate and bill increases on the lives of their clients.

5-7. Clients of those agencies will describe some of their experiences with respect to the operation of the Bay State Gas low-income energy efficiency program, as well as the impact of gas rate and bill increases on their lives.

8. A lawyer who deals with client complaints will describe some of the complaints against Bay State Gas and the resolution of those complaints.

9-10. John Howat, National Consumer Law Center, and a second witness will describe (and quantify to the extent practical) non-energy benefits of replacing unsafe or inefficient heating systems in low-income homes in the Bay State service territory.

11. Theo MacGregor, MacGregor Energy Consultancy will describe the low-income demographic characteristics of the Bay State Gas service territory, economic conditions in the Commonwealth that have an impact on low-income customers, and the impact of gas rate and bill increases on low-income customers.

12. A witness will testify about the impact of natural gas energy efficiency programs on natural gas demand, natural gas price and price volatility, and electricity price and price volatility.

13. A witness will testify about the cost-effectiveness under the Department's regulations and policies of replacing unsafe or inefficient heating systems in low-income homes in the Bay State service territory.

14-15. Ken Rauseo, Massachusetts Department of Housing and Community Development,, and another witness, will testify about the operation of the KeySpan natural gas energy efficiency program in the Commonwealth, the NStar Gas energy efficiency program in the Commonwealth, and how each of the aforesaid programs compares with the Bay State Gas energy efficiency program.

As is evident from this list, final arrangements have not been completed with every witness that MASSCAP et al. currently intends to sponsor. It is possible, for example, that some of the testimony described here as coming from separate witnesses will later be consolidated. It is also possible that the subjects addressed by certain witnesses will be different from that listed here. MASSCAP will file a notice as and if its intent changes with respect to witness presentation.

Respectfully submitted,

MASSCAP et al., by

Jerrold Oppenheim

cc: Hearing Officer, Service List